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British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, B.C. V6Z 2N3

**Attention: Ms. Laurel Ross, Acting Commission Secretary and Director**

**By Electronic Filing**

Dear Ms. Ross:

**Re: FortisBC Inc. Project No. 3698875: Net Metering Project Tariff Update Application  
Andy Shadrack: Submissions on Further Process**

These are my, Andy Shadrack's, submissions on further process.

I respectfully submit that FortisBC (FBC) has failed to provide enough information concerning FBC's Net Metering Tariff Update Application to allow me and the other interveners to adequately respond, or the Commission to make an informed decision.

For example, FBC's responses to BCUC information requests 1.2.4, 1.3.1, 1.3.2, 1.3.2.1, 1.3.2.2 and 1.4.1, and CEC request 1.8.1 fail to provide the contextual information necessary to fulfil its planning obligations under ss. 44.1 of the *Utilities Commission Act* and ss. 6 and 19 of the *Clean Energy Act*.

For instance, while FBC has provided a rough estimate of future net metering program enrolment (BCUC 1.2.3), FBC has failed to provide any target enrolment numbers for each of the eligible rate classes (CEC 1.8.6), the date by which these enrolment targets are expected to be achieved, and the potential overall reduction in MWh, all of which figures are necessary for it to meet its planning obligations under *Utilities Commission Act* s. 44.1.

FBC states, in response to BCUC request 1.2.1:

*“With respect to the NEG sold to FBC, since the Company accumulates NEG for customers as a dollar amount on the account, the exact kWh's are not available.”*

It has, however, been this intervener's experience that my own monthly customer account statements indicate both the cumulative amount and value of kWhs purchased from FBC and sold through my Solar PV installation, and it appears that the information would be available if FBC chose to tabulate it.

FBC further states, at BCUC 1.2.1:

*“The answer to this question cannot be provided as FBC does not have visibility of either the generation or consumption that occurs on the customer side of the meter ”*

at BCUC 1.6.3.1:

*“FBC cannot complete the requested analysis because it does not have any visibility of the amount of either generation or consumption that occurs behind the customer meter. Only net data is obtainable ”*

and at Shadrack 1.12:

*“The Company cannot provide information on total energy generated as it does not have visibility of any activity behind the customer meter”*

FBC’s representations on this subject may be technically correct. However, most, if not all, solar PV installations are equipped with a twenty-four hour (daily) inverter generation data log capability from which such information is readily available. The net metering program at this point consists of only about one hundred participants. It would be entirely within FBC’s purview and capability to conduct a simple survey of its enrolled solar PV customers, with perhaps a telephone call follow up, to provide the requested information - data without which it is impossible for either FBC or the Commission to determine how the net metering program fits into FBC’s long term resource and conservation planning as proscribed under section 44.1.

Due to the fact that FBC has failed to adequately respond to my information requests 1.21-1.22, 1.24 and 1.25, I suggest that no figures or other coherent data exist sufficient to allow the Commission to assess FBC's contention that retaining the retail rate for Net Energy (Excess) Generation represents an unfair subsidy as compared to what it spends on all the other demand side and energy conservation programs.

Finally, FBC has been reluctant to answer questions related to climate change, the goals of the *Clean Energy Act*, and long term energy planning within those contexts (Shadrack 1.29-1.32). I would like to point out that FBC is currently engaged in completing a Long Term Electricity Resource Plan (LTERP), which FBC expects to submit by November 30, 2016:

*“Our long term resource planning involves looking ahead 20 years to identify energy efficiency opportunities, energy supply requirements and infrastructure needs. Technology advancements, renewable energy options and growth in distributed generation are changing the way customers use energy. These and other issues will be explored through our long term resource planning process”*

and:

*“The outcome of the planning process is an action plan of activities that will allow us to continue to meet the energy and capacity needs of our customers and stakeholders over the longer term”*

<https://www.fortisbc.com/About/ProjectsPlanning/ElecUtility/ElecResourcePlanning/Pages/default.aspx>

In view of all of the foregoing, I would like to respectfully suggest that:

- a. FBC's application be postponed or adjourned until after FBC has completed its LTERP, by which time FBC would presumably, with more complete data, be able to better delineate the role of net metering within that plan, as well as in long term resource and conservation planning and distributed generation generally; or
- b. the Commission make a ruling on whether or not FBC has, in effect, inappropriately limited the scope of the hearings by not answering information requests concerning climate change, the goals of the *Clean Energy Act*, and related long term energy planning; and/or whether or not FBC has otherwise failed to provide adequate answers, and, if so, direct a second round of information requests;
- c. while I am not enthusiastic about an oral hearing in Vancouver or Kelowna, if the Commission is of the opinion that FBC's responses have been inadequate, the Commission consider some kind of oral telephone or voice-over-internet teleconference in the presence of the Commission in order to allow the Commission to rule on which questions are in scope and which are not.

All of which is respectfully submitted,  
Andy Shadrack